

Clara Young
ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

FILED

MAY - 9 2000

NANCY DOHERTY, CLERK

By
Deputy

CLARA YOUNG,
Plaintiff,

MEADOWGROVE APARTMENTS,
Defendant,

*
* CIVIL ACTION NO.

300CV-988-L

1. This Court has jurisdiction under 42 U.S.C. § 3613(a).
2. Plaintiff is Clara Young, a homeowner whose house is located within 500 feet of the Meadowgrove Apartments.
3. Defendant is Meadowgrove Apartments, the owners and operators of an apartment complex in South Dallas. This complaint refers to the apartment complex owned and operated by Meadowgrove Apartments as the "apartments."
4. The apartments are a public nuisance.
5. The apartments are an urban nuisance as defined by the City of Dallas Minimum Urban Rehabilitation Standard Ordinance, the Housing Code.
6. Meadowgrove Apartments deliberately refuses to abate the nuisances.
7. Meadowgrove Apartments' refusal to abate the nuisances reduces the number of persons willing to purchase or rent single family homes in the neighborhood. The nuisance conditions deter

potential buyers or renters from acquiring single family dwellings in the neighborhood.

8. Meadowgrove Apartments' refusal to abate the nuisances reduces the number of persons willing to rent units in the apartments. The nuisance conditions deter potential renters from acquiring multifamily dwellings in the neighborhood.

9. Meadowgrove Apartments' refusal to abate the nuisances at the apartments is because of the race of the tenants at the apartments and the race and color of the persons living in the other dwellings in the area.

10. Meadowgrove Apartments' refusal to abate the nuisances makes single family dwellings and multifamily dwellings unavailable because of race and color.

11. Meadowgrove Apartments' refusal to abate the nuisances directly injures plaintiff by reducing the value of her single-family house.

Claim for relief

12. The actions of Meadowgrove Apartments violate 42 U.S.C. § 3604(a) by making dwellings unavailable to persons because of race or color.

Prayer for relief

Plaintiff requests the following relief:


- A) an injunction ordering Meadowgrove Apartments to abate the nuisance conditions at the apartments,
- B) attorney's fees, litigation expenses, court costs, and
- C) any other appropriate relief.

Respectfully Submitted,

MICHAEL M. DANIEL, P.C.
3301 Elm Street
Dallas, TX 75226-1637

214-939-9230

FAX 214-939-9229

By: 
Michael M. Daniel
State Bar No. 05360500
Laura B. Beshara
State Bar No. 02261750
Attorneys for plaintiff